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November 14, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, D.C. 20002

FILED/ACCEPTED

NOV 14 2007

Federal Communications Commission  
Office of the Secretary

RE: Answers to Request for Admissions, Buzz Telecom Corp.; EB Docket No. 07-197

Dear Madame Secretary:

Enclosed for filing on behalf of parties Kurtis J. Kintzel, Keanan Kintzel, and all other Entities by which they do business before the Federal Communications Commission, is the original and 6 copies of the Answers to the Enforcement Bureau's Request for Admission of Facts and Genuineness of Documents to Buzz Telecom Corp. in the above-referenced matter.

Sincerely,

*Catherine Park, Esq.*

Catherine Park, Esq.

Enclosures: Original + 6 Copies

No. of Copies rec'd 096  
11/14/07

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )

Kurtis J. Kintzel, Keanan Kintzel, and all )  
Entities by which they do business before the )  
Federal Communications Commission )

Resellers of Telecommunications Services )

To: Presiding Officer, Richard L. Sippel )  
(Chief ALJ) )

EB Docket No. 07-197

**FILED/ACCEPTED**

**NOV 14 2007**

Federal Communications Commission  
Office of the Secretary

**ANSWERS TO ENFORCEMENT BUREAU'S REQUEST FOR ADMISSION OF FACTS  
AND GENUINENESS OF DOCUMENTS TO BUZZ TELECOM CORPORATION**

The party, by his undersigned counsel, hereby answers the Request for Admissions and Genuineness of Documents propounded by the Enforcement Bureau as follows:

- a. The information supplied in these Answers is true to the best of the party's knowledge, information, and belief;
- b. The word usage and sentence structure may be those of the attorney who in fact prepared these Answers and does not purport to be that of the executing party; and
- c. Discovery is not complete; the party reserves the right to supplement its Answers if additional information comes to its attention.

**Answers**

1. "Buzz operated as a common carrier under Title II of the Act during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the question because it is purportedly directed to “Buzz,” but the definition of “Buzz” provided by the Enforcement Bureau encompasses companies and entities clearly outside the reasonable range of a question purportedly directed to Buzz Telecom Corp., the corporation. By providing such an unreasonably broad definition of “Buzz,” the Enforcement Bureau seems to assume that it is entitled to pierce the corporate veil without pleading and proving the same. The Enforcement Bureau defines “Buzz” as “Buzz Telecom Corporation, any affiliate, d/b/a, predecessor-in-interest, parent company, wholly or partially owned subsidiary, successor-in-interest or other affiliated company or business, including but not limited to, BOI, Avatar and US Bell, and all directors, officers, employees, shareholders or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period February 11, 2004 through the present, unless otherwise noted.” The Order to Show Cause, FCC 07-165, does not allege specific facts that would justify corporate veil-piercing under existing law, and does not even allege that it is seeking to establish that Buzz Telecom Corp. is a sham corporate entity. Thus the inclusion of Buzz Telecom Corp.’s affiliates, parent companies, subsidiaries, etc., in the definition of “Buzz” is improper.

2. “Buzz has operated as a common carrier under Title II of the Act during the period December 2006 through the present.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The

party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

3. “Buzz is bound by a consent decree between the Commission and BOI dated on or about February 13, 2004 (the “Consent Decree”) in connection with a proceeding under EB Docket No. 03-85.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

4. “The Companies are signatories to the Consent Decree.”

Answer: Objection; the Consent Decree states in the first paragraph that it is entered into by the Commission and Business Options, Inc., and does not mention the other companies, thus the question whether the other companies are “signatories” is a matter of law. The question asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects because the question is directed to “the Companies” (which the Enforcement Bureau defines as “BOI, Buzz, Avatar and US Bell, or any one of those entities”), and the party objects to the definitions of “BOI,” “Buzz,” “Avatar,” and “US Bell” for the same reasons stated in the Answer to question 1 with respect to the definition of “Buzz.”

Denied, with respect to Avatar Enterprises, Inc., which cannot be bound by the 2004 Consent Decree because **Avatar Enterprises, Inc., never sold telecommunications services or telephone service, and should never have been subject to FCC oversight.** To the extent that

the 2004 Consent Decree suggests that Avatar Enterprises, Inc., ever acted as a carrier or telecommunications provider or reseller, the Consent Decree contains incorrect information. Avatar Enterprises, Inc., cannot be bound by the Consent Decree, because that would permit the FCC to exceed its subject matter jurisdiction, in derogation of the Communications Act of 1934. (Subject matter jurisdiction, unlike personal jurisdiction, can be raised at any time, even for the first time on appeal.)

5. “Buzz operated as a reseller of long-distance telecommunications service during the period February 11, 2004 through November 2006.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

6. “Buzz has operated as a reseller of long-distance telecommunications service during the period December 2006 through the present.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The corporation billed no customers after November 2006. The “Buzz” trade name was sold in an Asset Purchase Agreement to UMCC Holdings on December 1, 2006, and superseded by an Asset Purchase Agreement dated December 11, 2006. Any customer complaints against Buzz after November 2006 probably refer to the actions of UMCC Holdings, operating as “Buzz.” The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

7. “Kurtis J. Kintzel has been Chairman of the Board of Buzz Telecom from February 11, 2004 through the present.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party

objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

8. “Kurtis J. Kintzel has been President of Buzz during the period February 11, 2004 through the present.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

9. Kurtis J. Kintzel holds a 72 percent equity interest in Buzz.

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

10. “Kurtis J. Kintzel has held a majority equity interest in BOI from February 11, 2004 through the present.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

11. “Keanan Kintzel has been Secretary of Buzz Telecom during the period February 11, 2004 through the present.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

12. “Kurtis J. Kintzel and Keanan Kintzel are brothers.”

Answer: Objection; the question is irrelevant. The Order to Show Cause does not allege

any facts that would make such question relevant.

13. “BOI has had its business headquarters at 8380 Louisiana Street, Merrillville, Indiana from February 11, 2004 through the present.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

14. “Buzz was an affiliate of BOI during the period February 11, 2004 through the present.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

15. “Buzz is a successor-in-interest to US Bell.”

Answer:

16. “Buzz was an affiliate of US Bell and its successor, Link Technologies, during the period February 11, 2004 through the present.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

17. “Buzz was an affiliate of Avatar during the period February 11, 2004 through the present.

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

18-36. “Buzz failed to pay the full amount of its [July 2005-January 2007] invoice from the Universal Service Administrative Company (“USAC”) by the due date indicated on the invoice.

Answer: Objection; the questions are vague, and assume liability without pleading and proof. The Enforcement Bureau has failed to allege what “full amount” was required, and when liability is alleged to have accrued. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

37. “Buzz has made no payment toward its USAC debt that was transferred to the Commission per the Debt Collection Improvement Act.”

Answer: Objection; the question is vague, and assumes liability without pleading and proof. The Enforcement Bureau has failed to allege facts surrounding transfer of such debt per the Debt Collection Improvement Act, the alleged amount of such debt, and when liability is alleged to have accrued. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

38. “During the period February 11, 2004 through November 2006, Buzz was required to file annual FCC Form 499 Telecommunications Reporting Worksheets (“499-As”) pursuant to 47 C.F.R. § 64.1195.

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

39. “During the period February 11, 2004 through November 2006, Buzz was



required to file quarterly FCC Form 499 Telecommunications Reporting Worksheets (“499-Qs”) pursuant to 47 C.F.R. § 64.1195.

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

40-45. “Buzz failed to file its [Month, Year] [499-Q or 499-A] by the due date on the form.”

Answer: Objection; the questions are improper, because they assume that the party was liable for filing the worksheets without pleading and proof. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

46. “Buzz has failed to make required Telecommunications Relay Service (“TRS”) contributions to the National Exchange Carriers Association in a timely manner since September 28, 2004.”

Answer: Objection; the question is improper, because it assumes that the party was liable for payment of the contributions without pleading and proof. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

47. “Buzz has made no payment toward its TRS debt that was transferred to the Commission per the Debt Collection Improvement Act.”

Answer: Objection; the question is vague, and assumes liability without pleading and proof. The Enforcement Bureau has failed to allege facts surrounding transfer of such debt per the Debt Collection Improvement Act, the alleged amount of such debt, and when liability is

alleged to have accrued. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

48. “Pursuant to paragraph 15 of the Consent Decree, Buzz agreed to make a voluntary contribution to the Commission in the amount of \$510,000, payable in forty-eight (48) monthly installments.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

49. “Pursuant to paragraph 15 of the Consent Decree, Buzz agreed to make a voluntary contribution to the Commission in the amount of \$510,000, payable in forty-eight (48) monthly installments.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

50. “Buzz has not made all monthly payments toward the voluntary contribution due under the terms of the Consent Decree.”

Answer: Objection; the question is improper, because it assumes the party is liable for payment of the voluntary contributions without pleading and proof. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

51. “The Companies have defaulted on their obligation to make monthly payments toward the voluntary contribution due under the terms of the Consent Decree.”

Answer: Objection; the question is improper. It asks the party to draw numerous legal conclusions, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

52-57. “[Buzz or The Companies] failed to make the payment toward the \$510,000 voluntary contribution that was due in [Month, Year].”

Answer: Objection; the question is improper, because it assumes liability for payment of the voluntary contributions without pleading and proof. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

58. “In November 2006, Buzz discontinued service to all customers in each state where it had been providing services.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

59. “Prior to discontinuing service in November 2006 to all customers in each state where it had been providing services, Buzz failed to request and obtain authorization from the Commission to do so.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

60. “Prior to discontinuing service in November 2006 to all customers in each state where it had been providing services, BOI failed to request and obtain authorization from the applicable state public utility commission to do so.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

61. “Prior to discontinuing service in November 2006 to all customers in each state where it had been providing services, BOI failed to request and obtain authorization from the applicable state public utility commission to do so.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

62. “During the period February 11, 2004 through the present, section 248 of the Act (47 U.S.C. § 258) required Buzz to comply with the Commission’s verification procedures before submitting a change in a subscriber’s preferred interLATA/toll provider.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

63. “During the period February 11, 2004 through the present, 47 C.F.R. § 64.1120 required Buzz to obtain verification of the authorization to change a subscriber’s preferred interLATA/toll provider.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

64. “During the period February 11, 2004 through the present, 47 C.F.R. § 64.1120 required Buzz to comply with the Commission’s verification before submitting a change in a subscriber’s preferred interLATA/toll provider.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

65. “During the period February 11, 2004 through the present, 47 C.F.R. § 64.1120 required Buzz to obtain verification of the authorization to change a subscriber’s preferred interLATA/toll provider.”

Answer: Objection; the question is improper. It asks the party to draw a legal conclusion, although questions of law are to be decided by the Presiding Officer (Chief ALJ Richard L. Sippel), and burdens of production and proof are on the Enforcement Bureau. The party also objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

66. “Buzz did not provide to the Bureau verification tapes associated with ten slamming complaints received by the Commission, as required by the LOI and a follow-up

request from the Bureau.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

67. “Buzz did not provide to the Bureau a list of complaints received by Buzz from May of 2006 through December 20, 2006, as required by the letter dated December 20, 2006 from Trent B. Harkrader, Deputy Chief, Investigations & Hearings Division, Enforcement Bureau, Federal Communications Commission to Business Options, Inc. (“LOI”) seeking documents and information with respect to BOI and its affiliated companies.

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

68. “Buzz did not provide to the Bureau verification tapes associated with complaints received by Buzz from May 2006 through December 20, 2006, as required by the LOI.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

69. “Attachment A is a true and accurate copy of the Consent Decree.”

Answer: Denied that Attachment A is a true and accurate copy because it is missing the final order which determines the effective date spoken about in the Consent Decree. Since the order only becomes part of the record on the effective date, the final order is necessary to determine that this is a true and accurate copy.

70. “The signature that appears on Attachment A on behalf of Business Options, Inc.,

U.S. Bell, Inc./Link Technologies, Buzz Telecom Corporation and Avatar Enterprises, Inc., belongs to Kurtis J. Kintzel.

Answer: Admitted.

71. “Kurtis J. Kintzel had authority to sign the document that appears as Attachment A on behalf of Buzz.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

72. “Attachment B is a true and accurate copy of a letter from Kurtis J. Kintzel on behalf of Buzz and BOI, dated January 17, 2007, without attached documents.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

73. “One or more officers of Buzz personally prepared the document which is appended hereto as Attachment B.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

74. “One or more officers of Buzz personally reviewed the document which is appended hereto as Attachment B for truthfulness, completeness, and correctness before it was filed with the Commission.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to

question 1.

75. “Attachment C is a true and accurate copy of the declaration of Kurtis Kintzel dated February 9, 2007.”

Answer: Partially admitted and partially denied. The typed and signed portion is a true and correct copy, but the scribble on the page is not part of the original letter.

76. “One or more officers of Buzz personally prepared the document which is appended hereto as Attachment C.”

Answer: Admitted, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

77. “One or more officers of Buzz personally reviewed the document which is appended hereto as Attachment C for truthfulness, completeness, and correctness before it was filed with the Commission.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

78. “The signature that appears on Attachment C belongs to Kurtis Kintzel.”

Answer: Partially admitted and partially denied. The signature belongs to Kurtis J. Kintzel, President, Buzz Telecom Corp.

79. “At the time he signed Attachment C, Kurtis Kintzel was the Chief Executive Officer of BOI.”

Answer: Objection, because the question is irrelevant. Attachment D was not executed on behalf of Business Options, Inc. The Order to Show Cause does not allege any facts that



would justify veil-piercing under existing law, or that would otherwise make the question relevant.

80. “At the time he signed Attachment C, Kurtis Kintzel was the Chief Executive Officer of Buzz Telecom Corporation.”

Answer: Admitted.

81. “At the time Kurtis Kintzel signed Attachment C, Buzz Telecom was an affiliate of BOI.”

Answer: Denied, with respect to Buzz Telecom Corp., a corporation. The party objects to the definition of “Buzz” provided by the Enforcement Bureau, as stated in the Answer to question 1.

82. “At the time Kurtis Kintzel signed Attachment C, Buzz Telecom shared common ownership with BOI.”

Answer: Can neither admit nor deny, with respect to Business Options, Inc. “Common ownership” is a vague term and needs to be defined.

83. “Attachment D is a true and accurate copy of a bill, dated January 4, 2007, from the Federal Communications Commission, to Buzz Telecom Corp.”

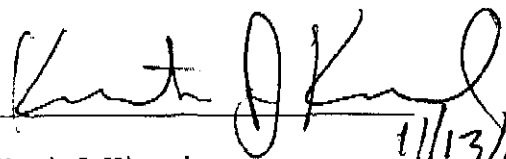
Answer: Objection; the question is improper, since it seems to ask the party to authenticate the document, although the party has no firsthand knowledge whether the document is authentic or not. The question probably should be directed to whoever prepared the bill.

84. “Buzz received a copy of Attachment D on or about January 4, 2007.”

Answer: Can neither admit nor deny, with respect to Buzz Telecom Corp., a corporation. There is no record at Buzz Telecom Corp. that Attachment G was received on or near January 4, 2007.

### SWORN STATEMENT

I hereby declare under penalty of perjury that the information supplied in the foregoing Answers is true to the best of my knowledge, information, and belief. The word choice and sentence structure may be those of the attorney and does not purport to be that of the executing parties. Discovery is not complete; the parties reserve the right to supplement their Answers if additional information comes to their attention.

  
Kurtis J. Kintzel  
President, Buzz Telecom Corp. 11/13/07

  
Catherine Park 11/13/07

Catherine Park, Esq. (DC Bar # 492812)  
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Washington, D.C. 20037  
Phone: (202) 973-6479

**Certificate of Service**


I HEREBY CERTIFY that a true and correct copy of the foregoing was sent for filing on this 14<sup>th</sup> day of November 2007, by hand delivery, to the following:

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, D.C. 20002

And served by U.S. Mail, First Class, on the following:

Richard L. Sippel, Chief Administrative Law Judge  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 1-C861  
Washington, D.C. 20554

Hillary DeNigro, Chief  
Michele Levy Berlove, Attorney  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 4-C330  
Washington, D.C. 20554



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Catherine Park